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1001 Wotan Road  
Columbia, South Carolina 29229  
February 20, 2008

VIA HAND DELIVERY  
The Honorable Charles Terreni  
Chief Clerk, Administrator  
South Carolina Public Service Commission  
101 Executive Drive, Suite 100  
Post Office Drawer 11649  
Columbia, South Carolina 29211

RECEIVED  
2008 FEB 21 AM 10:55  
SC PUBLIC SERVICE  
COMMISSION

Re: Motion to Establish a Second Hearing for the Purposes  
of Examining Newly-Presented Evidence by the Utilities  
Relative to the Petition of the Office of Regulatory Staff to  
Establish Dockets to Consider Implementing of the Require-  
ments of Section 1251 (Net Metering) of the Energy Policy  
Act 2005, Docket No. 2005-385-E

Dear Mr. Terreni,

Please find enclosed on behalf of myself, an intervener in the original hearing for the above established Docket, ten copies of the Motion to establish an additional hearing to examine new evidence concerning their net metering tariffs prepared and presented by the utilities Progress Energy, Duke Power, and South Carolina Electric and Gas to the PSC.

Please accept this original and eleven copies of this motion for filing. Please file stamp the eleventh copy enclosed and return it to me via certified mail.

By copy of this letter, I am serving all other parties of record with a copy of the enclosed motion and attached certificate of service.

Feel free to contact me regarding any question you may have.

Sincerely,

*Pamela Greenlaw*  
Pamela Greenlaw  
Intervener

*Enclosures*

*CC: Monette S. Edwards, Esquire  
Shannon Bowyer Hudson, Esquire  
Len A. Anthony, Esquire  
Catherine Heigel, Esquire  
Catherine Taylor, Esquire*

*John F. Hardaway  
Mel Jenkins  
Keith Thomas  
David Odell*


**BEFORE THE**  
**PUBLIC SERVICE COMMISSION**  
**MOTION ON DOCKET NUMBER 2005-385-E**

Motion to Establish a Second Hearing For the Purposes )  
Of Examining Newly-Presented Evidence Relative to the )  
Petition of the Office of Regulatory Staff to Establish )  
Dockets to Consider Implementing of the Requirements )  
of Section 1251 (Net Metering) of the Energy Policy )  
Act 2005, Docket No. 2005-385-E )  
\_\_\_\_\_ )

**CERTIFICATE  
OF  
SERVICE**

This is to certify that I have caused to be served this day eleven copies of the  
**Motion to Establish a Second Hearing for the Purposes of Examining Newly  
Presented Evidence Relative to Net Metering, Docket No. 2005-385-E.**

Nanette S. Edwards, Esquire  
Shannon Boyer Hudson, Esquire  
Office of Regulatory Staff  
1441 Main Street, Suite 300  
Columbia, SC 29201

  
\_\_\_\_\_

Columbia, South Carolina  
This 21<sup>st</sup> day of February 2008

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SC PUBLIC SERVICE  
COMMISSION

MOTION TO ESTABLISH A SECOND HEARING FOR THE PURPOSES OF  
EXAMINING NEWLY-PRESENTED EVIDENCE RELATIVE TO  
THE PETITION OF THE OFFICE OF REGULATORY STAFF TO ESTABLISH DOCKETS  
TO CONSIDER IMPLEMENTING OF THE REQUIREMENTS OF SECTION 1251 (NET  
METERING) OF THE ENERGY POLICY ACT 2005, DOCKET NO. 2005-385-E

Submitted by Pamela Greenlaw, Intervener

1 By this motion I hereby petition the Public Service Commission to hold an additional hearing  
2 for the purposes of examining new evidence and cross-examining witnesses testifying about the  
3 that new evidence presented to the Public Service Commission  
4 concerning the actual net metering program, including tariffs, proposed by Progress Energy, Duke  
5 Power, and South Carolina Electric and Gas. The utilities listed above were ordered by the Public  
6 Service Commission to develop and present their net metering tariff structures. These qualify as  
7 new evidence, which the interveners have the right to examine. Only Duke Energy and South  
8 Carolina Electric and Gas sent copies of their net metering tariffs to the interveners. Progress Ener-  
9 gy did not, and must do so immediately.

10  
11 After such time as Progress Energy completes this task and sufficient time is given for proper  
12 examination and study, the additional hearing should be placed on the calendar and the interveners  
13 must be invited to come and cross examine witnesses concerning these new tariffs.

14  
15 As you may recall, the only witness presenting tariffs in the original hearing was Barbara Yarbor-  
16 ough. As she was not presenting the tariffs to be used for net metering, cross-examination of  
17 that witness was irrelevant to this case. This means that the interveners have not had an  
18 opportunities to cross-examine witnesses whose testimony is indeed relevant to the case.

19  
20 The briefing – the proceedings which took place -- did so over the objections of counsel, Nanette  
21 Edwards. Her objection has legal foundation, and I urge the Public Service Commission to follow  
22 her expert recommendation. Please include the interveners in all proceedings until this docket is  
23 complete.

24  
25 In light of the above rationale, I urge the Public Service Commission to accept and approve the  
26 Motion to Establish a Second Hearing for the purposes of examining newly-presented evidence  
27 relative to the petition of the Office of Regulatory Staff to Establish Dockets to consider . . . net  
28 metering.

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